



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 31
11500 W OLYMPIC BLVD
SUITE 600
Los Angeles, CA 90064-1753

Agency Website: www.nlrb.gov
Telephone: (310)235-7351
Fax: (310)235-7420



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February 23, 2022

Ramogi Huma, Executive Director
National College Players Association
6709 Borges St.
Corona, CA 92880

Re: University of California Los Angeles
(UCLA), Pac-12 Conference, and The
National Collegiate Athletics Association
(NCAA), as joint employers
Case 31-CA-290328

Dear Mr. Huma:

We have docketed the first amended charge that you filed in this case.

Investigator: This charge is being investigated by Field Attorney AMANDA LAUFER whose telephone number is (310)307-7337. If the agent is not available, you may contact Supervisory Field Attorney JOANNA SILVERMAN whose telephone number is (310)307-7309.

Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

Prohibition on Recording Affidavit Interviews: It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

Procedures: Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn

statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site (www.nlr.gov). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink that reads "Mori Rubin". The signature is written in a cursive, flowing style.

MORI RUBIN
Regional Director



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February 23, 2022

Gene Block
University of California, Los Angeles (UCLA)
Box 951405
2147 Murphy Hall
Los Angeles, CA 90095-1405

Maggy Carlyle
Pac-12 Conference
360 3rd Street, 3rd Floor
San Francisco, CA 94107

Scott Bearby
The National Collegiate Athletics Association (NCAA)
1802 Alonzo Watford Senior Drive
Indianapolis, IN 46202

Re: University of California Los Angeles
(UCLA), Pac-12 Conference, and The
National Collegiate Athletics Association
(NCAA), as joint employers
Case 31-CA-290328

Dear Mr. Block, Ms. Carlyle, Mr. Bearby:

Enclosed is a copy of the first amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney AMANDA LAUFER whose telephone number is (310)307-7337. If the agent is not available, you may contact Supervisory Field Attorney JOANNA SILVERMAN whose telephone number is (310)307-7309.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

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Very truly yours,

A handwritten signature in black ink that reads "Mori Rubin". The signature is written in a cursive, flowing style.

MORI RUBIN
Regional Director

Enclosure: Copy of first amended charge

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**UNIVERSITY OF CALIFORNIA LOS ANGELES
(UCLA), PAC-12 CONFERENCE, AND THE
NATIONAL COLLEGIATE ATHLETICS
ASSOCIATION (NCAA), AS JOINT
EMPLOYERS**

Case 31-CA-290328

Charged Party

and

**NATIONAL COLLEGE PLAYERS
ASSOCIATION**

Charging Party

AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on February 23, 2022, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

Gene Block
University of California, Los Angeles
(UCLA)
Box 951405
2147 Murphy Hall
Los Angeles, CA 90095-1405

Maggy Carlyle
Pac-12 Conference
360 3rd Street, 3rd Floor
San Francisco, CA 94107

Scott Bearby
The National Collegiate Athletics Association
(NCAA)
1802 Alonzo Watford Senior Drive
Indianapolis, IN 46202

February 23, 2022

Date

Jorge Romero, Designated Agent of NLRB

Name

/s/ Jorge Romero

Signature



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NATIONAL LABOR RELATIONS BOARD

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February 23, 2022

Ramogi Huma, Executive Director
National College Players Association
6709 Borges St.
Corona, CA 92880

Re: University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA),
as joint employers
Case 31-CA-290326

Dear Mr. Huma:

We have docketed the first amended charge that you filed in this case.

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MORI RUBIN
Regional Director



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February 23, 2022

Adam C. Abrahms, Attorney at Law
Epstein Becker & Green, PC
1925 Century Park East, Suite 500
Los Angeles, CA 90067-2706

Michael Ferrell, Esquire
Epstein Becker & Green, P.C.
1925 Century Park East, Suite 500
Los Angeles, CA 90067

Re: University of Southern California (USC),
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA),
as joint employers
Case 31-CA-290326

Dear Mr. Abrahms, Mr. Ferrell:

Enclosed is a copy of the first amended charge that has been filed in this case.

Investigator: This charge is being investigated by Field Attorney AMANDA LAUFER whose telephone number is (310)307-7337. If the agent is not available, you may contact Supervisory Field Attorney JOANNA SILVERMAN whose telephone number is (310)307-7309.

Presentation of Your Evidence: As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

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Very truly yours,

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MORI RUBIN
Regional Director

Enclosure: Copy of first amended charge

University of Southern California (USC), - 3 -
Pac-12 Conference, and The National
Collegiate Athletics Association (NCAA),
as joint employers
Case 31-CA-290326

February 23, 2022

cc: Beong-Soo Kim
 University of Southern California (USC)
 3551 Trousdale Parkway, ADM 352
 Los Angeles, CA 90089-5013

Maggy Carlyle
Pac-12 Conference
360 3rd Street, 3rd Floor
San Francisco, CA 94107

Scott Bearby
The National Collegiate Athletics
Association (NCAA)
1802 Alonzo Watford Senior Drive
Indianapolis, IN 46202

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**UNIVERSITY OF SOUTHERN CALIFORNIA
(USC)**

Charged Party

and

**NATIONAL COLLEGE PLAYERS
ASSOCIATION**

Charging Party

Case 31-CA-290326

AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST EMPLOYER

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on February 23, 2022, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

Beong-Soo Kim
University of Southern California (USC)
3551 Trousdale Parkway, ADM 352
Los Angeles, CA 90089-5013

Adam C. Abrahms, Attorney at Law
Epstein Becker & Green, PC
1925 Century Park East, Suite 500
Los Angeles, CA 90067-2706

Michael Ferrell, Esquire
Epstein Becker & Green, P.C.
1925 Century Park East, Suite 500
Los Angeles, CA 90067

Maggy Carlyle
Pac-12 Conference
360 3rd Street, 3rd Floor
San Francisco, CA 94107

Scott Bearby
The National Collegiate Athletics Association
(NCAA)
1802 Alonzo Watford Senior Drive
Indianapolis, IN 46202

February 23, 2022

Date

Jorge Romero, Designated Agent of NLRB

Name

/s/ Jorge Romero

Signature

Adam C. Abrahms
t 310.557.9559
f 310.943.3367
AAbrahms@ebglaw.com

April 28, 2022

VIA EMAIL

Amanda Laufer
Field Attorney
National Labor Relations Board - Region 31
11500 W Olympic Blvd, Suite 600
Los Angeles, CA 90064-1753
Telephone: (310) 307-7337
Email: amanda.laufer@nlrb.gov

**Re: University of Southern California (USC), Pac-12 Conference, and The
National Collegiate Athletics Association (NCAA)
Case 31-CA-290326**

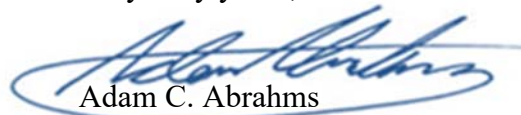
Dear Ms. Laufer:

As you are aware, this law firm represents the Respondent, the University of Southern California ("USC"), with respect to labor matters including the above-referenced matter.

Due to the tremendously expansive requests included in the Region's EAJA Letter, the busy time period at the end of the academic year, and the conclusion of the spring sports schedule at USC, we are, for the first time, requesting a two-week extension to file our position statement, with the relevant documents, until May 16, 2022. We believe this full extension is necessary to most effectively and efficiently aid in the Region's investigation and provide a meaningful response.

Should you have any questions, please do not hesitate to contact us.

Very truly yours,


Adam C. Abrahms

cc: Michael S. Ferrell (MFerrell@ebglaw.com)
Brock Olson (BOlson@ebglaw.com)